Country of Origin Labeling Program Agricultural Marketing Service, USDA Stop 0249, Room 2092-S 1400 Independence Avenue, SW Washington, D.C. 20250-0249

Mr. William T. Hawks Under Secretary for Marketing and Regulatory Programs U.S. Department of Agriculture

7 May 2003

Dear Under Secretary Hawks,

As a consumer and mother of young children, I am concerned about how safe my food supply is. One key piece of information I use to judge safety is knowing where a given food product is produced. The proposed "Country of Origin" labels offer me an important, and currently missing, element in the "food selection puzzle". Knowing which country a given food has come from allows me to assess the likelihood that the food meets my personal standards for such qualities as pesticide exposures or safe processing.

Because voluntary labels would be next to useless, I feel that making the labeling mandatory is necessary. Some food producers may not wish to disclose their products' origins – whether they fear unfounded consumer bias against particular countries, or for some other reason. It is the role of the one government agency charged with protecting our safe food supply – the USDA – to insist that such basic factual information be provided to consumers. If food producers wish to educate consumers about the safety or acceptability of various "countries of origin", then that is a business matter for which the food producers are responsible – not the government. IT IS INAPPROPRIATE FOR OUR GOVERNMENT TO ENACT REGULATIONS THAT "SHIELD" CONSUMERS FROM BASIC, FACTUAL INFORMATION ABOUT THEIR FOOD CHOICES.

I support the adoption by the USDA of simple, effective guidelines for the mandatory country of origin labeling program, such as those recommended by the **Americans for Country of Origin Labeling** coalition. Other members of the Americans for Country of Origin Labeling coalition raise the issue of allowing informed consumers to make purchasing choices to support domestic food producers. I personally base my food buying decisions almost entirely on safety and quality, but I am also sympathetic to the idea of wanting to support quality local producers.

I understand that there is much controversy about how to implement mandatory country of origin labeling, and I urge you to keep several points in mind as you develop the rules.

Retailers and packers have already signaled their intent to put a greater burden on suppliers than is required by the Farm Bill. For example, some packers are demanding that producers obtain a third-party certification of origin. This seems to be an excessive, "road block" sort of requirement. This is unnecessary and unfair to small producers who already face enough obstacles. Any labeling program should place a record-keeping burden only on processors / packers and retailers. This can be accomplished by giving the only authority to conduct audits to USDA, and instructing processors and retailers to add country of origin information to existing paperwork transactions. This addition should not be a "big deal"!

As a concerned consumer, there have been many occasions when I declined to purchase fruit or vegetables when I could not determine its origin, and thus had little to assure me of its safety. I would very much like to see the broadest possible number of foods labeled with their "country of origin". "Avoiding the regulations" tricks such as enhancing a covered product by adding water, flavoring, salt, or other seasoning should not exempt a food product from the labeling requirements, nor should other processing such as cooking, curing, or roasting.

IF FOOD COMPANIES ARE WORRIED ABOUT NEGATIVE
CONSUMER REACTIONS TO "COUNTRY OF ORIGIN" LABELS,
THEY HAVE A BUSINESS OBLIGATION TO UNDERTAKE A
MARKETING / EDUCATION PROGRAM TO – TRUTHFULLY –
ASSURE CONSUMERS OF THE SAFETY OF THE FOOD
PROCESSING IN ANY "QUESTIONABLE" COUNTRIES. IT IS
COWARDLY AND DECEITFUL FOR THEM TO ATTEMPT TO AVOID

## PROVIDING SUCH BASIC FACTUAL INFORMATION TO CONSUMERS.

IT WOULD BE SHAMEFUL FOR THE GOVERNMENT TO AID THE FOOD PRODUCERS IN THEIR "RESISTANCE", INSTEAD OF AIDING CONSUMERS.

If consumers' negative reactions are, in fact, well-founded, then the food producers have an excellent incentive to help raise the quality and safety standards in the "areas of concern", to the benefit of all the concerned parties.

I urge you and the USDA to ensure that the rules for mandatory country of origin labeling live up to their potential, and allow US consumers to have accurate, complete information about where our food is produced. Consumers are able to where other consumer goods like clothing are produced -- it is *crucial* that such important products as our food be at least as well documented.

Sincerely,

Catherine Beaver

15600 NE 8th St. Suite B1

Catheir Bearen

PMB 105

Bellevue, WA 98008